

COMMONWEALTH OF VIRGINIA



**SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM
EMPLOYMENT AND TRAINING**

**STATE PLAN OF OPERATIONS
FEDERAL FISCAL YEAR 2016**

PART I
SUMMARY OF VIRGINIA'S SUPPLEMENTAL NUTRITION
ASSISTANCE PROGRAM (SNAP)
EMPLOYMENT AND TRAINING (E&T)

A. Abstract of the State E&T Program

Although not a mandated federal partner, SNAP E&T is a mandated state partner of the Workforce Innovation and Opportunity Act (WIOA). The Virginia Department of Social Services is dedicated to partnering with the workforce development systems in the Commonwealth to provide high quality workforce services to all SNAP E&T participants in selected areas of the State.

The Virginia Social Services System will continue helping unemployed E&T participants find meaningful employment that will move them towards self-sufficiency. The services outlined in this state plan support this important objective. When approval is received, the Federal Fiscal Year (FFY) 2016 state plan will be placed with previous state plans on the Virginia Department of Social Services (VDSS) web site at: (<http://spark.dss.virginia.gov/divisions/bp/fs/SNAPET.cgi>).

Virginia's SNAP E&T Program will provide the following services in select counties and cities to participants: Job Search, Basic Employment Skills Training (Job Readiness), Community Work Experience, Vocational Training, Education including e-learning and job retention services.

Virginia continues to supplement the SNAP E&T services at local departments of social services (LDSS) through several agreements with service providers at the state and local levels. Online learning services for SNAP E&T participants will continue to be provided through a contract with NICCE, LLC. Educational services online include basic skills training, career readiness leading to a Career Readiness Certificate (CRC), and preparatory courses for the General Educational Development (GED) certificate, as well as information on demand occupations and non-traditional jobs for women. GED tests are administered by the Virginia Department of Education and are accredited. Online learning is a sub-part of the education component.

VDSS continues its contract with the Virginia Department of Criminal Justice Services (DCJS), a state agency, to collaborate with re-entry organizations receiving state funding through DCJS to offer unique employment and training services to ex-offenders who are participants in SNAP E&T. The Virginia SNAP E&T ex-offender program is designed as follows:

- 1) The SNAP participant is enrolled in the SNAPET program, an assessment is done and a Plan of Participation is completed.

- 2) Using a specifically developed form, a referral of a SNAP recipient with a criminal background is sent from the local department of social services to the local re-entry organization, if an agreement exists between the local agency and the re-entry organization. The re-entry organization can send a referral to the local department of social services to check for eligibility and to request a referral back;
- 3) The ex-offender is assigned to a case manager at the re-entry organization;
- 4) A plan for finding employment is discussed and agreed to;
- 5) The SNAP ex-offender is assigned to an approved SNAP E&T component;
- 6) The ex-offender is required to provide evidence of completion of the assignment;
- 7) The case manager sends documentation to the local department of social services of the hours in the assigned components; and
- 8) The re-entry agency submits statements of the component activities to the Virginia Department of Social Services (VDSS) each month and an invoice with documentation to the Virginia Department of Criminal Justice Services (DCJS) for reimbursement. DCJS combines all invoices and submits to VDSS for reimbursement.

The re-entry organizations with signed agreements are: Offender Aid and Restoration (OAR) of Charlottesville; OAR of Richmond; OAR of Arlington; and Virginia Cares. The local agencies who have committed to referrals are: Charlottesville; Arlington, Alexandria; Roanoke City and Roanoke County.

The majority of ex-offenders who find themselves at a re-entry organization are eligible for SNAP assistance. As required, the services offered to those ex-offenders enrolled in the SNAP E&T program are unique to this population. All activities provided to the ex-offenders have a direct link to employment.

The Virginia Department of Social Services' (VDSS) Workforce Development Unit which is responsible for the SNAP E&T program has developed an MOA with the Office of Newcomer Services at VDSS. Work requirements imposed on refugees participating in refugee resettlement programs substitute for work requirements imposed on SNAP participants in accordance with **Federal Regulations at Part 273-CERTIFICATION OF ELIGIBLE HOUSEHOLDS; §273.7-Work provisions;** and **(a) Work Requirements** at (5). There is no SNAP E&T cost associated with this agreement. The SNAP E&T accepts the employment section of the resettlement provider's comprehensive Resettlement Plan in lieu of the SNAP E&T Plan of Participation. The resettlement staff notifies the SNAP E&T staff if a client is not participating in a work or employment training activity provided by the resettlement agency in order for SNAP E&T staff to take appropriate action.

As has been the case since March 2008, local SNAP E&T agencies use an automated reporting and case management system to capture participant information. This system is part of the Virginia Department of Social Services Employment Services Program Automated System (ESPAS) that is also used for

the employment portion of the Temporary Assistance for Needy Families (TANF) Program. Since (FFY) 2009, local reports and federally required quarterly reports have been produced in the Virginia Department of Social Services' Data Warehouse by using information available through ESPAS. Reports are available for local and state use including monthly individual agency reports, agency characteristic reports and federally required quarterly reports.

1. Program Changes

Although Virginia in FFY 2016 continues to be ineligible for a statewide waiver to suspend the ABAWD work requirements, the Commonwealth has decided to continue its voluntary program. The decision to continue a voluntary program is brought about by the lack of funds to serve all required work registrants in the state. As implemented, the voluntary program is available in all 25 of the current SNAP E&T localities. The continuation of a voluntary program allows limited funding to be used for those who truly need and want employment services to help them obtain meaningful employment. In addition, a voluntary program removes the risk of a SNAP E&T participant losing access to SNAP benefits through sanctions associated with SNAP E&T participation and frees up local staff from paperwork to concentrate on helping the participants find employment.

Without a statewide ABAWD waiver, Virginia and the local agencies ability to "sell" the advantages of the SNAP E&T program to potential participants continues to be very important. Although the expected increase in participants did not materialize during FFY 2015, we expect to see an increase with the realization that SNAP benefits for ABAWDs are limited without a work activity.

As gasoline prices continue to be high and transportation is needed to fulfill required attendance, we are requesting that the amount of transportation allowance per participant remain at an average of \$50.00 per month. Through its local agencies, Virginia will provide the following Supportive Services:

1. Child Day Care
2. Transportation to include
 - Agency or public transportation;
 - Individuals other than public transportation-such payment must be pre-authorized and reimbursement cannot exceed the current mileage reimbursement rates; and
 - Gas vouchers.
3. Other, to include:
 - Clothing suitable for job interviews;
 - Licensing and bonding fees for a work experience or job placement;

- Uniforms;
- Work Shoes;
- Purchase of an initial set of tools or equipment if required for a SNAP E&T component or job retention component;
- Fingerprinting, if necessary for a job;
- Background check, if necessary for a job;
- Medical services such as TB testing if required for a job;
- Personal safety items required to complete training/educational coursework;
- Books;
- Course registration fees;
- Drug tests if required for a job;
- Eye exam and vision correction, such as the purchase of eyeglasses;
- Dental work such as routine cleaning;
- Minor auto repairs;
- Test fees and training material directly related to a SNAP E&T component;
- Union dues necessary for a job; and
- Housing assistance including rent and/or utilities not to exceed \$500.00 per occurrence and no more than two times in a 12 month period. (Participants must be in dire need with the risk of eviction or loss of utilities.)

Also, the Commonwealth, in order to increase the number of work sites available and to reduce the competition with TANF for these sites, will continue to use for-profits, as they become available, to provide work experience (Section 817 of PRWORA amending section 6(d)(4) by deleting certain limitations imposed on work experience assignments). The Commonwealth will abide by all SNAP rules and regulations governing work experience.

The work experience will:

- 1) Be Voluntary;
- 2) Occur either in a for-profit; nonprofit, or the public sector;
- 3) Occur for a limited period of time;
- 4) Provide Worker's Compensation;
- 5) Have hours derived by dividing SNAP benefits by the minimum wage; and
- 6) Be unpaid.

The requirements used now for nonprofit/public sites will also apply to for-profits.

- 1) Position will not serve to replace a worker not participating in the program; and

2) The same benefits and working conditions are provided to SNAP E&T participants as those provided to regular employees performing comparable work and hours.

Virginia will continue to offer job retention services to SNAP E&T participants for a period not to exceed 90 days after employment, if the employment is related to a component. These services include: training and education needed to maintain and advance in employment (100 percent federal funds are used for these costs) and supportive services such as transportation (These costs are supported with 50 percent funds). Virginia will continue to offer job retention services during the 2016 federal fiscal year, as we have realized that many individuals going from unemployment to employment need help with such things as transportation before the first paycheck. Training and education may be advisable for a longer period of time (up to 90 days) to help the employee retain a job.

2. ABAWD Population

- a. Virginia's ABAWD population
 ABAWD numbers have been captured in our automated system since the statewide waiver exempting them from the time-limit restrictions expired on September 30, 2013. The latest number related to ABAWDs available is from May 2015, when 10,238 ABAWDs were referred into the SNAP E&T queue in the 22 local departments of social services (Idss) operating SNAP E&T Programs. The SNAP E&T program during federal fiscal year 2015 was offered in 22 local departments of social services operating in 25 localities.¹
- b. Characteristics of the ABAWD population
 This population continues to face severe barriers to employment including disabilities, chronic substance abuse, mental illness and previous incarceration. In addition, the lack of basic workplace skills and illiteracy play a major part in preventing employment. Not only is the SNAP E&T staff and third party service providers being used to address these barriers, but VDSS is working with its partners at the Department of Behavioral Health and Developmental Services, the Department for Aging and Rehabilitative Services, the Department of Criminal Justice Services and the Virginia Community College System, the administrator of the Workforce Investment Act, to address the challenges.
- c. ABAWDs in high surplus labor markets
 Virginia submitted a request to the USDA/FNS for a waiver to exempt ABAWDs from the time-limit who live in localities with a scarcity of

¹ Some local departments of social services serve more than one locality. As of SFY 2016, Virginia operates a full E&T program in a total of 22 local departments of social services covering 25 localities.

available jobs or a 10 percent or higher regional unemployment rate. This request was approved and 35 Idss are waived for the period May 2015-April 2016.

- d. State's 15% exemption allowance
Virginia is not using the 15% exemptions at this time to extend the period of eligibility for time-limited SNAP participants.
- e. ABAWD Clock

According to the Virginia SNAP Manual, the 36-month clock is a fixed period from the first of the month in which a household containing an individual subject to the Work Requirement is certified in Virginia. The 36-month period will begin and continue for any household member between the ages of 18-50. Any month in which an affected individual received the full benefit month as part of a certified household will count toward the three-month limit. The Statewide waiver lifting the time limit on ABAWDs expired on September 30, 2013. On October 1, 2013, the three-month limit for ABAWDs receiving food assistance in a 36 month period began in all areas of the state with the exception of individual waived localities.

3. Additional Allocation for "Pledge" States

Virginia will not be a pledge state.

4. Program Components

The Virginia SNAP E&T Program will offer the following components:

- Job Search;
- Work Experience;
- Education, including e-learning;
- Vocational Training;
- Basic Employment Skills Training (Job Readiness);
- Job Retention Services; and
- SNAP E&T for Ex-offenders (can include several components).

5. Sequencing of Components

Assignment of participants to components is based on individualized assessment and the development of an Individual Plan of Participation. The plan outlines the specific sequence of component activities to which the

participant is assigned. Initial assignments may be any one or a combination of components.

The ultimate goal for all SNAP E&T participants is to gain employment and become self-sufficient. To reach this goal, it is necessary to accurately identify and overcome barriers that may be present, such as lack of transportation, work history or previous incarceration. Virginia is committed to addressing these barriers so that SNAP E&T participants can obtain and maintain meaningful employment. The services offered will vary based on individual situations and needs.

The number of hours and choice of program components for individual participants will not only vary according to the employment needs of the individual, but the services existing in specific areas served by the SNAP E&T program, as well as the funding available.

6. Other Employment Programs

Virginia's SNAP E&T Program, although not a federally mandated partner, is a state mandated partner in the Commonwealth's workforce development system. The local departments of social services inform SNAP E&T participants of the full breadth of services provided by all service providers in the One-Stop System.

7. Workforce Development System

Virginia's SNAP E&T Program is part of the Commonwealth's Workforce Development System. Several of the local departments of social services act as comprehensive or satellite One-Stop Centers. The partners in the workforce system will continue to work together to offer financial and non-financial assistance to SNAP E&T participants. Services and relationships vary by community.

8. Outcome Data

Statistical data on the types of employment found is now being captured in our Data Warehouse System. The majority of employment obtained by SNAP E&T participants, as in the past several years, continues to fall into the following categories:

- Food Service
- Sales, Retail and Other
- Computer Operations
- Secretarial/Administration/Office Management
- Cashier/Teller
- Clerical/Receptionist
- Construction Laborer
- Public Safety/Security

- Housekeeping/Janitorial
- Driver/Delivery
- Teacher/Aide
- Nurse's Aide/Companion
- Barbering/Cosmetology
- Building and Grounds/Maintenance
- Warehouse/Stock Clerk
- Child Care
- Mechanic/Machinery Repair/Machine Operator
- Production Work/Assembly
- Electronics/Office Equipment Service and Repair

B. Component Summaries

The following component summaries describe the activities which will be offered at local SNAP E&T agencies. To arrive at the number of ABAWDs and non-ABAWDs served, the most recent historical data (FFY 2014) available to Virginia operating under a voluntary program was used and the number of participants in components in FFY 2015 through the first two quarters.

1. Job Search

Description of component

The Job Search activity consists of a self-directed effort to find paid employment. SNAP E&T participants will be enrolled in this component if determined "ready to work" after being assessed. Job Search participants are required to contact employers either via face-to-face interviews or by submission of applications or resumes. In order to count as an employer contact, the contact must be with an employer who ordinarily employs individuals in areas of work for which the participant is reasonably qualified.

Type of component

Job Search will be a work component when offered through the Commonwealth's Workforce System operated under the Workforce Innovation and Opportunity Act or Section 236 of the Trade Act. Job Search will be a non-work component when offered by other than those listed above.

Anticipated number who will begin this component

It is estimated that 3,000 participants will enter Job Search. Of this number, approximately 925 ABAWDs and 2,075 non-ABAWDs are expected to participate.

Level of participant effort

Participants may spend up to 8 weeks per 12 months in Job Search and be required to report on the number of job contacts made.

Targeted population

SNAP E&T participants based on employability assessment and labor market conditions.

Organizational responsibilities

Job Search will be operated by the SNAP E&T agency, a service provider, or another One Stop Partner in the state's workforce system. The entity responsible will vary by community and by the individual needs of the participant. In all cases, progress and compliance will be reported to the local department of social services.

Method for monitoring job contacts

Participants will be monitored by the component provider and will be required to submit a signed form listing job search contacts made. Local agencies will assume responsibility for program compliance.

Per participant cost of reimbursement

It is estimated that 2,650 participants will receive transportation assistance. Two Thousand-Three Hundred (2,300) will receive an average of \$50 per participant per month in transportation assistance for an average of one month- $2,300 \times \$50 \times 1 \text{ month} = \$115,000$. The remaining participants could receive up to two months of transportation assistance- $350 \times \$50 \times 2 \text{ months} = \$35,000$ for a total of \$150,000. It is estimated that 130 participants will incur temporary child care costs of approximately \$325 (\$42,250). Total: \$192,250

Total cost of the component and cost per participant

An estimated \$2,432,771 (\$2,240,521 in administration and \$192,250 in reimbursements) will be expended on Job Search. The average cost per participant will be \$810.92.

2. Work ExperienceDescription of component

In this component, participants gain work experience and new job skills through unpaid work in a public, private non-profit or for-profit agency. The primary focus of work experience is to help the participant develop good work habits, additional job skills, positive work attitudes and an understanding of the employee-employer relationship. Participants may be offered a Work Experience opportunity if they are preparing to enter the workforce and it is determined that additional guidance is required to yield sufficient employment opportunities.

Type of component

Work component

Anticipated number who will begin this component

It is estimated that 350 participants will enter Community Work Experience. Of those enrolled in this component, approximately 250 will be ABAWDs and 100 will be non-ABAWDs.

Targeted population

The Work Experience component is designed to develop and reinforce good work habits and yield positive future job references. Assignment to this component will take into consideration the results of the Individual Plan of Participation, prior training, experience, skills and employment goal(s) of the participant.

Level of participant effort

The number of hours a participant is required to participate in any one month is determined by dividing the household's SNAP allotment by the federal minimum wage, minus hours of participation in other work components. No participant will work more than 30 hours per week or eight hours in a given day without his/her consent. The employer will determine the length of the placement.

Organizational responsibilities

SNAP E&T service provider(s) will assume responsibility for ensuring that Work Experience opportunity development, participant assignment and monitoring are carried out within the guidelines established by the state.

Per participant cost of reimbursement

It is estimated that 300 participants will receive an average of \$50 per individual per month in transportation assistance for an average of 3.0 months (300 x \$50 x 3 months = \$45,000). It is estimated that 31 participants will incur temporary child care costs of \$325 (\$10,075). It is estimated that 50 participants will need other supportive services at an average cost of \$148.00 (\$7,400).

Total: \$62,475

Total cost of the component and cost per participant

An estimated \$141,918 (\$73,193 in administration, \$6,250 in Workers' Compensation premiums, and \$62,475 in reimbursements) will be expended on Community Work Experience. The average per participant cost will be approximately \$405.48.

3. Education

Description of component

SNAP E&T participants will be referred to education based on individual need and assessment. Web-based courses will be used in addition to traditional adult education.

Included are education-level assessment, GED, and pre-GED courses. All participants using web-based courses have access to personal mentors that guide their progress, answer questions, etc. VDSS has entered into a partnership agreement with NICCE, LLC, to offer an extensive web-based program including a component for individuals who read between the 3rd and 6th grade level.

Type of component

Non-work component

Type of education activities

Educational programs to which participants are assigned include, but are not limited to, Adult Basic Education, General Educational Development (GED), Career Readiness Certificate (CRC) preparation, short-term vocational education, community college programs and post-secondary education. When appropriate, web-based education courses are utilized. Participant progress in web-based education are monitored and attested to by the web-based education service provider.

Anticipated number who will begin this component

It is estimated that 400 SNAP E&T participants will enter this component as several of the local providers will concentrate on the attainment of a GED and/or CRC. It is estimated that 188 ABAWDs and 212 non-ABAWDs will enter this component.

Targeted population

SNAP E&T participants will be assigned to an educational component if educational deficits are a primary barrier to employment. These could include:

- Individuals having trouble understanding written English.
- Individuals needing basic education classes.
- Individuals pursuing a GED or High School Diploma.
- Individuals who need a credential to help them find or advance in employment.

Level of participant effort

Participant effort will vary with the type of educational experience provided. Participation in education programs will be limited to the amount of time required to complete the curriculum scheduled in the Individual Plan of

Participation. ABAWD participants will spend a minimum of 20 hours per week in education unless combined with other components.

Organizational responsibilities

SNAP E&T service providers will offer or sub-contract courses. Progress will be monitored by the SNAP E&T service provider and the local agency SNAP E&T case manager.

Link to employment

When it is determined that education is a primary barrier to employment, assignment to an educational component is appropriate. At the completion of this component, the participant may be assigned to individual job search to facilitate immediate job entry.

Per participant cost of reimbursement

It is estimated that 325 participants will receive an average of \$50 per individual per month in transportation assistance for an average of 3.0 months (325 x \$50 x 3 months = \$48,750). It is estimated that 30 participants will incur temporary child care costs of \$325 (\$9,750) and 241 will receive an average of \$50.00 (\$12,050) in other supportive services. Total: \$70,550

Total cost of the component and cost per participant

An estimated \$613,278 (\$251,653 in administration, \$291,075 in contractual costs and \$70,550 in reimbursements) will be expended on Education. The average cost per participant will be approximately \$1,533.20.

4. Vocational Training

Description of component

Vocational training includes occupational assessment, customized training, institutional skills training, upgrade training, and vocational education. As available, some vocational education and training may be offered on-line.

Other components of this training will be evaluated and may include vocational training of participants to provide child care for other participants.

Type of component

Non-work component

Anticipated number who will begin this component

It is estimated that 250 participants will enter this component. Of those participating, it is estimated that 150 ABAWDs and 100 non-ABAWDs will enter this component.

Level of participant effort

Participation effort will vary with the type of training provided. Most training will be three to six months in duration. ABAWD participants will spend a minimum of 20 hours per week in vocational training unless combined with other components.

Targeted population

SNAP E&T participants will be considered for vocational training if it appears that training is needed in order to improve the participant's employability.

Organizational responsibilities

When it is necessary, the SNAP E&T service provider will refer a participant to vocational training. The vocational training provider may be, among others, a community college, Workforce Investment Board/One Stop contractor, Rehabilitative Services agency, Technical Center and other certified providers or an on-line learning provider. Progress will be monitored by the SNAP E&T service provider and the local agency case manager.

Per participant cost of reimbursement

It is estimated that 95 participants will receive an average of \$50 per individual per month in transportation assistance for an average of 5 months ($95 \times \$50 \times 5 \text{ months} = \$23,750$). An estimated 17 participants will incur temporary child care costs of \$325 (\$5,525) and 50 will receive an average of \$82.00 (\$4,100) in other supportive services.

Total: \$33,375

Total cost of the component and cost per participant

It is estimated that \$550,556 (\$232,441 in administration, \$284,740 in contractual services and \$33,375 in reimbursements) will be expended on vocational training. The average cost per participant will be an average of \$2,202.22.

5. Job Readiness-Basic Employment Skills Training (BEST)Description of component

BEST will include activities that may consist of job skill assessments, occupational exploration, training and counseling in personal preparation for employability, training and counseling in techniques for identifying and pursuing employment opportunities (including information on local emerging and demand occupations and job placement services).

Type of Component

Non-work component

Anticipated number who will begin this component

It is estimated that 1,000 participants will enter Basic Employment Skills Training. It is estimated that 610 ABAWDs and 390 non-ABAWDs will enter this component.

Targeted population

Participants who do not have severe barriers to employment, but are not employment-ready, will be assigned to this component.

Level of participant effort

The number of hours of participation will be based on need.

Organizational responsibilities

SNAP E&T service providers will offer Basic Employment Skills Training. Progress will be monitored by the SNAP E&T service provider and the local agency case manager. In all cases, the local agency will assume the responsibility for the successful operation of the component.

Per participant cost of reimbursement

It is estimated that 475 participants will receive an average of \$50 per participant per month (up to three months) in transportation assistance ($475 \times \$50 \times 3 = \$71,250$). It is estimated that 33 participants will incur \$325 in temporary child care costs (\$10,725) and 100 will incur costs associated with other supportive services in the average amount of \$28.50 for a total of (\$2,850).

Total: \$84,825.

Total cost of the component and cost per participant

An estimated \$426,460 (\$291,635 in administration, \$50,000 in contractual services and \$84,825 in reimbursements) will be expended on Basic Employment Skills Training. The average cost per participant will be approximately \$426.46.

6. Education and Training for Ex-Offenders

Description of component

SNAP E&T for Ex-Offenders is offered in partnership with VDCJS through its re-entry program. This component will include activities that may consist of job skill assessments, occupational exploration, training and counseling in personal preparation for employability, training and counseling in techniques for identifying and pursuing employment opportunities (including information on local emerging and demand occupations and job placement services), as well as the sharing of costs for education and vocational training and supportive services. Match funding for this component comes from VDCJS and are state funds.

Type of Component

Non-work component

Anticipated number who will begin this component

It is estimated that 300 participants will enter this component. It is estimated that 200 ABAWDs and 100 non-ABAWDs will enter this component.

Targeted population

Ex-offenders who are receiving SNAP and are not employment-ready will be assigned to this component where services are available.

Level of participant effort

The number of hours a participant is required to participate in any one month is based on need.

Organizational responsibilities

Service providers in Virginia's Re-entry Program will administer this component. Participant progress will be monitored by the service providers and the local case manager.

Per participant cost of reimbursement

It is estimated that 150 participants will receive an average of \$50 per participant per month (up to six months) in transportation assistance ($150 \times \$50 \times 6 = \$45,000$). 200 participants will receive an average of \$75.00 for additional supportive services (\$15,000). It is estimated that 39 participants will incur \$325 in temporary child care costs (\$12,675).

Total: \$72,675

Total cost of the component and cost per participant

An estimated \$600,000 (\$527,325 in administration and \$72,675 in reimbursement) will be expended on ex-offenders in this component. The average cost per participant will be approximately \$2,000.

7. Job Retention

The costs associated with this service will be primarily used for administration and supportive services. If training or education is indicated, this will come out of the existing training and education components. It is estimated that 200 participants will take advantage of this service. Of the 200 participants, it is estimated that 125 will be ABAWDs and 75 non-ABAWDs.

Per participant cost of reimbursement

It is estimated that 130 participants will receive \$50 per individual per month in transportation not to exceed 3 months (90 days) ($130 \times \$50 \times 3 \text{ months} = \$19,500$). An estimated 80 participants will be provided additional

supportive services for the cost of (\$3,300) or \$41.25 each. An estimated 20 participants will incur temporary child care costs of \$325 (\$6,500).
Total: \$29,300

Total cost of the component and cost per participant

It is estimated that \$137,778 (\$108,478 in administration and \$29,300 in reimbursements) will be expended on job retention. The average cost per participant will be \$688.89.

8. Community College Vocational Training Project

The Commonwealth has agreements with three community colleges to offer employment assistance to SNAP E&T participants. Two of the three colleges have agreements with local businesses and industries to train SNAP E&T participants who have demonstrated aptitude in these fields for job openings. Once training has been completed, the participant is interviewed by the business, and is usually hired. Most continue to be employed one year after starting work. The third college does not have partnerships with specific employers, but trains SNAP E&T participants for employment in demand occupations in the area. Approximately 81 E&T participants can obtain vocational training leading to employment. It is estimated that 50 of the 81 participants will be ABAWDs with 31 non-ABAWDs.

Per participant cost of reimbursement

It is estimated that 58 participants will receive an average of \$50 per individual per month in transportation assistance not to exceed 3 months (58 x \$50 x 3 months = \$8,700). An estimated 50 participants will be provided additional supportive services for the cost of \$3,350 or \$67 each.
Total: \$12,050

Total cost of the component and cost per participant

An estimated \$256,500 (\$244,450 in contractual/purchase services and \$12,050 in reimbursement) will be expended on the project. The average cost will be \$3,166.67.

9. Other Activities

In order to best meet recipient and local social service department needs and promote creative program design, localities will be given authority to establish additional activities to those already specified in this plan. Such programs shall be described in local employment plans and shall conform with the federal requirement that they be designed to move individuals to self-sufficiency. Plans specifying such alternative activities will be available for USDA review. Virginia will report such activity information as required.

C. Geographic Coverage

Virginia operates the SNAP E&T Program in 25 localities served by 22 local departments of social services. The localities are: Arlington County; Brunswick County; Fairfax County; Henry County/Martinsville City; King and Queen County; Pittsylvania County; Prince William County; Roanoke County; Rockbridge County/Lexington/Buena Vista; Surry County; Tazewell County, Alexandria City; Bristol City; Chesapeake City; Danville City; Hampton City; Newport News City; Norfolk City; Portsmouth City; Richmond City; Roanoke City; and Virginia Beach City.

PART II PROGRAM PARTICIPATION AND EXEMPTIONS

A. Work Registrant Population

1. Number of Work Registrants

- a. Number of work registrants receiving SNAP expected to be in the state as of October 1, 2016:

188,000

- b. Anticipated number of new work registrants to be added between October 1, 2014 and September 30, 2016:

132,000

- c. Total number of work registrants in the state between October 1, 2015 and September 30, 2016:

320,000

2. Unduplicated Work Registration Count

The estimated number of work registrants is based on an unduplicated work registrant count provided from data input into the Application Benefit Delivery Project (ADAPT) by the eligibility worker when the client's status for SNAP E&T is determined.

3. Characteristics of Work Registrants

Data can be extracted from the system through the data warehouse initiative. Local agencies determine the characteristics of the work registrants in their respective localities in order to develop their local plan of operation. These plans are provided to the state.

B. Exemption Guidelines

1. Exemption Criteria Justification

- a. Categorical Exemptions – Geographic
All of the work registration population will be exempt from mandatory participation in SNAP E&T and services will be offered on a voluntary basis; however, they will not be exempt from the work requirement.
- b. Individual and Personal Exemptions
See Table 1.
- c. Number of Work Registrants Exempt from the SNAP E&T Program
See Table 1.
- d. Planned SNAP E&T Program Participation
See Table 2.
- e. ABAWD Information
See Tables 1 and 2.

PART III PROGRAM COORDINATION

A. Program Coordination

1. Narrative Coordination Statement

The linkage between the SNAP eligibility functions and the SNAP E&T functions is as follows:

At every application, reapplication, and recertification for SNAP, the eligibility unit/worker will screen each individual to determine if (s) he is subject to the time limit and work registration provisions of federal regulations. The eligibility worker will provide information on the SNAP E&T program to all SNAP participants and refer all SNAP participants not exempt from work registration and any others who might wish to volunteer to the SNAP E&T program.

SNAP E&T case managers will receive these referrals through the ESPAS system's Queue. Contact will be made with the potential participant. If a SNAP participant volunteers for the SNAP E&T Program, the SNAP E&T case manager or service provider will monitor the participant's compliance with the component requirements. Every attempt will be made to facilitate

participants' compliance. In the event of non-compliance, the SNAP E&T case manager will:

- Request an explanation of why the participant did not carry out the specific program requirement;
- Explain to the participant what must be done in order to comply with the program requirement and the date by which he/she has to respond;
- Provide the phone number and name of the SNAP E&T case manager to contact; and
- Explain the consequence of non-compliance (termination from the program).

Participants who fail to comply with work requirements have five working days from the date the request to comply is mailed to contact the SNAP E&T case manager or service provider. The participant, during this time period, can respond by providing evidence of good cause for not complying with the requirement or the participant can actually comply with the component assignment.

Should the participant not respond within the required time period, the SNAP E&T participant will be terminated from the SNAP E&T program.

2. Information Coordination

At the state and local levels, eligibility and SNAP E&T Program staff work together in a number of ways to attempt to improve coordination and information flow. Examples of these cooperative efforts include:

a. State level

- Joint meetings are held to develop guidelines and procedures and to resolve issues;
- Guidelines and procedures are exchanged while in draft form to allow comments and revisions;
- Forms are jointly designed; and
- Information releases to locality staff are made jointly when possible.

b. Local level

- Joint meetings are held to familiarize staff with the guidelines of their counterparts, to resolve specific guidance issues, and to facilitate coordination within the agency;
- Local staff participate in joint training; and
- Partner agencies report client activity to local departments of social services including any instance when clients are not meeting their component requirements.

3. Coordination Time Frames

The eligibility worker will notify the SNAP E&T case manager or service provider of a participant's work registration within five days of approval of an application/reapplication or recertification for SNAP benefits.

The SNAP E&T case manager or service provider will conduct screening for barriers to employability and assess employment and training needs within 30 calendar days of receipt of notification of the participant's referral to SNAP E&T and the participant's desire to volunteer for the SNAP E&T program.

When the SNAP E&T case manager or service provider determines that non-compliance has occurred, the individual will be given five working days to contact the SNAP E&T case manager or service provider to provide evidence of good cause for not complying or to actually comply. If evidence of good cause is not shown, and the participant makes no effort to comply, the SNAP E&T case manager or service provider will notify the eligibility worker that the SNAP E&T case has been terminated.

B. Interagency Coordination

Interagency coordination occurs at the state and local levels. All SNAP E&T service providers coordinate their operations with the employment services component of the TANF Program. In addition, local operations have linkages with WIBs, One-Stop Centers, Rehabilitative Services and other agencies or programs, as appropriate. The methods of coordination are dependent upon the needs of the participant and the services available in the localities, including, but not limited to interagency agreements, memorandums of understanding and contracts for provisions of services.

(See Table 3, Summary of Interagency Coordination)

C. Contractual Arrangements

The VDSS and local agencies will enter into contractual partnerships with organizations that provide workforce services. Procurement of services will conform to existing state and local procurement laws and regulations.

VDSS contracts or Memorandums of Agreement:

- 1) NICCE, LLC-Blackstone, VA-serving the entire SNAP E&T community per e-learning.
 - a. Amount of the contract-\$291,075
 - b. Basis for charging costs to the contract-monthly invoices based on scope of work; administration, assessments, adult education and training, etc.
 - c. Number of clients expected to be served-numbers included in the education component vary per month; however, 400 are expected to use the e-learning component during the year.

- 2) Dept. of Criminal Justice Services (Richmond) through its PAPIS Organizations to serve statewide
 - a. Amount of the contract-not to exceed \$600,000
 - b. Basis for charging costs to the contract-services provided to SNAP participants
 - c. Number of clients expected to be served-300

- 3) Tidewater Community College, Danville Community College and Patrick Henry Community College
 - a. Amount of the Memorandum of Agreement-not to exceed \$244,450
 - b. Basis for charging costs to the contract-services provided to SNAP participants
 - c. Number of clients expected to be served-81

- 4) Richmond City Department of Economic Development (Center for Workforce Innovation)
 - a. Amount of the Memorandum of Agreement-not to exceed \$106,970
 - b. Basis for charging costs to the contract-services provided to SNAP participants
 - c. Number of clients expected to be served-up to 200

- 5) Charlottesville City Office of Economic Development
 - a. Amount of the Memorandum of Agreement-not to exceed \$22,500
 - b. Basis for charging costs to the contract-approved services to be provided to SNAP participants
 - c. Number of clients expected to be served-up to 9

Local departments of social services contracts as of 10/1/13: New contract information to be received in SNAP E&T 2016 local plans to become effective on 10/1/16.

- 1) Danville-City of Danville-Transportation; Danville Community College-Career Readiness Certificate
 - d. Number varies each month
 - e. Based on number of funds available
- 2) Danville-GemStone Professional Services-Job Readiness Training
 - a. Number varies each month
 - b. Based on number of users and funds available
- 3) King and Queen County-Workforce Development Center-Job Readiness; Mid Peninsula R.A.C.E-GED classes; and Rappahannock Community College-Career Readiness
 - a. Number varies each month
 - b. No cost
- 4) Martinsville/Henry-Patrick Henry Community College-Job Readiness, Vocational Training, Internships, Work Experience
 - a. Fixed fee
 - b. \$780.00 per client
 - c. Planned entered employment- 6
- 5) Newport News-GENEX Services-Job Readiness Training Services; WIA-Full Range of Employment Services
 - a. Fixed amount for contract with GENEX
 - b. 6 job placements expected
- 6) Norfolk-Tidewater Community College-Vocational Education
 - a. Fixed amount for contract
 - b. 8 per year with a 80 percent placement rate
- 7) Norfolk-Avatar-Job Skills Training
 - a. Cost varies
 - b. 6 participants per year
 - c. Placement included
- 8) Pittsylvania County-Pittsylvania County Community Action Agency-Job Readiness
 - a. Fixed cost for 10 students
 - b. Additional cost for each over 10
- 9) Roanoke County-Goodwill of the Valley-Case Management
 - a. Fixed contract

- b. 125 served each year
 - c. Job Placement-45
- 10)Roanoke County-TAP-Virginia Cares (Ex-Offender Services)
- 11)Surry County-Job Corps-GED, Career and Training
- a. No cost
 - b. 5 per year
- 12)Surry County-BP Gasoline-Transportation
- a. 75 per year
 - b. Set cost per participant
- 13)Surry County-Step-Up, Inc.-Ex-offender services
- a. No cost to the agency
 - b. 18 served per year
- 14)Surry County-Surry County Extension Office
- a. Basic Computer Skills
 - b. No cost
 - c. 10 served each year
- 15)Tazewell County-Clinch Valley Community Action-Job Readiness
- a. Fixed price
 - b. 70 served per year
 - c. Job placement-15

PART IV PROGRAM COSTS AND FINANCIAL MANAGEMENT

A. Planned Costs of the State SNAP E&T Program

1. Operating Budget

For FFY 2016, a total state administration expenditure of **\$5,159,261.00** is projected. See Table 4.

2. Sources of SNAP E&T Funds

See Table 5.

3. Justification of Education Costs

Virginia does not supplant state education costs from the state to the federal government. The state SNAP E&T guidelines state that program funds to

support educational activities will only be used when such services cannot be secured within the community at no cost. Only costs attributed to education after enrollment in SNAP E&T are considered for payment. The costs attributable to the educational component are mainly those associated with SNAP E&T staff time involved in referring participants to educational programs in the community and tracking their progress in these programs.

B. Contracts

The Virginia Department of Social Services does not at this time have contractual partnerships with non-profit employment services providers. However, VDSS does have a contract with NICCE, LLC, a small, woman-owned for-profit company; a Memorandum of Agreement (MOA) with VDCJS to offer services to SNAP E&T participants; and a MOA with the Richmond City Department of Economic Development and Charlottesville City Department of Economic Development to supplement training and funding for SNAP E&T and SNAP participants by using local funds. NICCE is providing e-learning through its Adult Career Education (VAace) project. VDCJS, through its re-entry program, is offering all aspects of services to ex-offenders, as explained under “Abstract of the State’s SNAP E&T Program” who are SNAP E&T participants. The service providers will be responsible for all component content, while the local departments of social services will provide local oversight and case management services. In addition, through a MOA, we have developed a partnership with three community colleges to provide vocational training services to SNAP E&T participants. These contracts will expire when the recently awarded Pilot Program to Reduce Dependency and Increase Work Requirements and Work Effort under SNAP is implemented, as these three colleges are a part of the Pilot. Pilot achievements will not be reported with the regular SNAP E&T.

(See Part III. C., Contractual Agreements, for additional information)

C. Participant Reimbursement

In the Virginia SNAP E&T Program, localities and their contractual partners are responsible for assessing the participant’s need for child care, arranging for the provision of child care and reimbursement of the child care provider. The type of child care provided for participants will usually fall into one of the three following types: in-home child care, family child care or child care center. The in-home child care involves utilizing a provider who is responsible for the supervision and care of a child in the child’s own home. This type of child care does not include family members. The family child care involves the use of an individual who is responsible for the supervision or care of children in the provider’s home. A child care center is a facility operated for the purpose of providing care, protection and guidance to a group of children separated from their parents during a part of the day.

In Virginia’s system, the localities pay the child care provider for services provided. The service worker will negotiate, in advance, with the provider and parents the

type of service to be provided and the rate of payment. Costs are based on \$325.00 in temporary child care costs per participant needing the service, as funds are limited.

The referral process to the child care service provider operates as follows. The participant chooses a child care provider from an approved list made available by the service worker. If the participant chooses a provider who is not on the list, the service worker will help the provider to obtain state and/or local approval. The parents and provider then sign a Child Care Information and Agreement form which details the type of child care arrangement agreed upon. The service worker is responsible for tracking the children's participation in the child care center.

As with child care, the local agency is responsible for verifying the need for other dependent care and for paying the dependent care provider. Unlike child care, the participant is responsible for all arrangements, though the agency can provide assistance if needed.

1. Method of Reimbursement

For transportation, service providers are paid directly or participants are provided with vouchers for transportation assistance. Participants are not required to incur out-of-pocket transportation expenses. For child care, reimbursement for actual expenses, up to the market rate, will be made to the service provider, not the participant.

2. Procedure for Reimbursement

The SNAP E&T Program pays the child care provider for actual expenses incurred up to the market rate. Other non-child care providers of dependent care are reimbursed for actual expenses. Under the current system, the localities send a purchase order for services to the dependent care provider that specifies the name of the dependent, rate of pay and period of time for which the dependent care provider will be paid. The dependent care provider then submits an invoice at least monthly that specifies the amount of dependent care service provided. The locality then reviews the invoice to determine if it is accurate, meets the specifications of the purchase order and does not exceed the market rate.

For transportation, service providers are paid directly or participants are provided with vouchers for transportation assistance. The average reimbursement is \$50.00 per month per participant in need. Participants are not required to incur out-of-pocket transportation expenses. For child care, reimbursement for actual expenses, up to the market rate, will be made to the service provider, not the participant. Expenditures for both transportation and child care are reported by the local agency to the Locality Automated System for Expenditure Reimbursement (LASER), a system that

tracks local agency expenditures and provides reimbursements to the local agency.

D. Cost Allocation

At the local level, the time spent on SNAP E&T is captured using the Random Moment Sampling process and administrative costs are charged accordingly. Many localities have a dedicated SNAP E&T case manager or service provider who is not administering other programs. SNAP, including SNAP E&T, are included in the state's cost allocation plan. The cost allocation plan is submitted to and approved by the United States Department of Health and Human Services, our federal cognizant agency.

PART V PROGRAM REPORTING AND MANAGEMENT INFORMATION

A. Method for Obtaining Initial Count of Work Registrants

An initial count of work registrants will include work registrants on-board as of October 1 and those added through October 31 as required by federal regulations. An automated report showing the numbers of work registrants on-board as of October 1 is produced, as previously noted, using the ADAPT system. An automated report is generated to count those added between October 1 and October 31 and each month thereafter.

B. Method for Ensuring an Unduplicated Work Registrant Count

In all agencies, the cases are "flagged" on October 1 so that even if those individuals register again during the fiscal year, they will not be counted as new work registrants more than once. Notation is made in the case record at the time an individual first becomes a new registrant for a program year. At the end of any subsequent registration, the individual's earlier status is noted and the individual is then counted separately as an SNAP E&T re-entrant. These individuals are not included in the counts relating to new work registrants or SNAP E&T participants.

C. Methods for Meeting On-Going Federal Reporting Requirements

1. Management Information System (MIS) Method

- a. Type of MIS
SNAP application and eligibility data is maintained in ADAPT. SNAP E&T case data is now part of the automated system (ESPAS) that is used to capture information on the Virginia Initiative for Employment not Welfare (VIEW), the employment part of TANF. The system is available for case management and reporting for the SNAP E&T

Program. All required program reports (monthly and quarterly) have been produced using this system beginning with the 2008 4th quarter.

Local financial reporting continues to be automated through LASER.

b. Local reporting requirements

(I) Non-financial:

- (a) SNAP E&T participants newly registered and re-registrants;
- (b) Assessments-Pre-Assessments, Initial Assessments and Reassessments;
- (c) Referred, not assessed;
- (d) Pending and Inactive Status;
- (e) SNAP E&T participants who volunteer for and commence participation in an approved component, broken out by type of component begun; and
- (f) Entered employment.

The information obtained from the monthly reports produced in the Data Warehouse and from other data available in the Data Warehouse is used to complete the FNS-583.

(ii) Financial:

- (a) Local agencies are required to maintain financial reports on total local expenditures and submit reimbursement requests for total expenditures by category;
- (b) Participant reimbursement will be reported for each client with the federal, state and local shares of the costs identified. State office staff will monitor total SNAP E&T expenditures on a monthly basis; and
- (c) Cost information for ABAWDs and non-ABAWDs will be distinguished separately as appropriate.

The Division of Finance completes the FNS-269 report utilizing expenditure data from LASER.

2. Organizational Responsibility for SNAP E&T Reporting

Non-Financial

Faye Palmer
Manager, Workforce Development
Virginia Department of Social Services
Division of Benefit Programs
801 East Main Street, 9th Floor
Richmond, VA 23219-3301
(804) 726-7938

Financial

My Lushao, Grant Accountant
Virginia Department of Social Services
Division of Finance
801 East Main Street, 14th Floor
Richmond, VA 23219-3301
(804) 726-7280

TABLE 1**ESTIMATED PARTICIPANT LEVELS FOR FISCAL YEAR 2016**

A. Anticipated number of work registrants in Virginia during the fiscal year.

320,000

B. Planned exemption categories and the number of work registrants expected to be included in each are based on the latest available numbers before Virginia applied for a full state waiver.

a. Individuals 17 years of age and younger or 50 years of age or older:

1,941

b. Individuals who, at the time of evaluation, are medically certified as unfit for regular employment, as determined by VDSS:

31,194

c. Individuals who reside in a household with a minor child:

218,280

d. Pregnant Women:

4,248

e. Individuals who reside in an exempt locality:

5,680

* All work registrants will be exempt from being a mandatory SNAP E&T participant, as Virginia's SNAP E&T program is *voluntary*.

TOTAL EXEMPTIONS

| | | |
|-----------|---|--------|
| C. | Percent of all work registrants exempt from SNAP E&T | 82% |
| D. | Number of SNAP E&T mandatory participants (voluntary) | 0 |
| E. | Anticipated number of ABAWDs in Virginia during the fiscal year | 58,657 |
| F. | Anticipated number of ABAWDs residing in waived areas of Virginia during the fiscal year | 12,164 |
| G. | Anticipated number of <i>case-month exemptions</i> under the State's 15% exemption allowance during the fiscal year | 0 |
| H. | Number of at-risk ABAWDs expected in Virginia | 46,493 |

TABLE 2

**ESTIMATED SNAP E&T PLACEMENTS
FISCAL YEAR 2016**

- | | | |
|---|---|------------|
| 1 | Number of ABAWD applicants and recipients expected to participate in a qualifying ABAWD component each month | 150 |
| 2 | Number of all other applicants and recipients (including ABAWDs involved in non-qualifying activities) expected to participate in a component each month. | 400 |
| 3 | Total number of applicants and recipients VDSS expects to participate in a component each month during the fiscal year. | 550 |

**ESTIMATED INDIVIDUAL PARTICIPATION
FISCAL YEAR 2016**

Unduplicated Number of individuals expected to participate in the SNAP E&T Program during the fiscal year:

3,500

TABLE 3**SUMMARY OF INTERAGENCY COORDINATION FOR THE SNAP E&T PROGRAM IN FISCAL YEAR 2016**

| Areas of Coordination | Agencies Involved | Number of SNAP E&T Placements Expected | Methods of Coordination |
|--|--|---|--------------------------------|
| 1. Delivers a SNAP E&T component: | SNAP E&T service provider(s) Local Dept. of Social Services; Community Colleges; DCJS; Non-Profits and For-Profits | 6,000 | Contractual (MOA and MOU) |
| 2. The SNAP E&T Program delivers a service for another agency or program: | N/A | | |
| 3. Joint component of the SNAP E&T Program and another agency or program: | Refugee Resettlement Organizations Through VDSS Newcomer Services | 100 | (MOU) |
| 4. Referral of individuals from the SNAP E&T Program to another program or agency: | VA Dept. for Aging and Rehabilitative Services VA Employment Commission | 750 | Referral (MOU) |
| 5. Other forms of coordination | N/A | | |

TABLE 4**OPERATING BUDGET – FISCAL YEAR 2016**

| Components | State Agency Costs | | | Participant Reimbursement (State plus Federal) | | State Agency Cost for Dependent Care Services | Total |
|---|----------------------|----------------|----------------------|---|--------------------------|---|-----------------------|
| | Salary & Benefits | Other Costs | Contractual Costs | Dependent Care | Transportation/ Other | | |
| Job Search | 2,240,521.00 | | | \$42,250.00 | \$150,000.00 | | \$2,432,771.00 |
| Community Work Experience | \$73,193.00 | \$6,250* | | \$10,075.00 | \$52,400.00 | | \$141,918.00 |
| Education | \$251,653.00 | | \$291,075.00 | \$9,750.00 | \$60,800.00 | | \$613,278.00 |
| Vocational Training | \$232,441.00 | | \$284,740.00 | \$5,525.00 | \$27,850.00 | | \$550,556.00 |
| Basic Employment Skills Training | \$291,635.00 | | \$50,000.00 | 10,725.00 | \$74,100.00 | | \$426,460.00 |
| SNAP E&T for ex- offenders | N/A | | \$527,325.00 | \$12,675.00 | \$60,000.00 | | \$600,000.00 |
| Job Retention Services | \$108,478.00 | | | \$6,500.00 | \$22,800.00 | | \$137,778.00 |
| Community College Vocational Training Project | N/A | | \$244,450.00 | N/A | 12,050.00 | | \$256,500.00 |
| Total Component Costs | | | | | | | \$5,159,261.00 |
| Total State SNAP E&T Costs | | | | | | | \$5,159,261.00 |

* Cost of Workers' Compensation Insurance (\$50 per participant)

TABLE 5**PLANNED FISCAL YEAR COSTS OF THE STATE SNAP E&T PROGRAM BY CATEGORY OF FUNDING****FISCAL YEAR 2016**

| Funding Category | Approved FY 2016 Budget | Fiscal Year 2016 |
|--|--------------------------------|-------------------------|
| 1. 100 Percent Federal SNAP E&T Grant | | \$2,116,431.00 |
| 2. Share of \$20 Million ABAWD Grant | | |
| 3. Additional SNAP E&T Administrative Expenditures | | \$2,485,330.00 |
| 50% Federal | | \$1,242,665.00 |
| 50% State | | \$1,242,665.00 |
| 4. Participant Expenses: | | |
| a. Transportation/Other | | 460,000.00 |
| 50% Federal | | 230,000.00 |
| 50% State | | 230,000.00 |
| b. Dependent Care | | 97,500.00 |
| 50% Federal | | 48,750.00 |
| 50% State | | 48,750.00 |
| 5. Total SNAP E&T Program Costs | | \$5,159,261.00 |
| 6. 100% State Agency Cost for Dependent Care | | ----- |
| 7. Total Planned Fiscal Year Costs (Must agree with Table 4—Operating Budget) | | \$5,159,261.00 |

